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*Attorneys for Defendants
Transamerica Life Insurance Company,
Transamerica Investment Management, LLC
and Transamerica Asset Management, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JACLYN SANTOMENNO, KAREN
POLEY, and BARBARA POLEY, et
al.,

Plaintiffs,

v.

TRANSAMERICA LIFE
INSURANCE COMPANY,
TRANSAMERICA INVESTMENT
MANAGEMENT, LLC, and
TRANSAMERICA ASSET
MANAGEMENT, INC.,

Defendants.

Civil Action No. 11-736 (FSH) (PS)

**DEFENDANTS'
NOTICE OF MOTION
TO STAY DISCOVERY**

TO: Robert L. Lakind
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Attorneys for Plaintiffs

COUNSEL:

PLEASE TAKE NOTICE that on Monday, June 20, 2011, at 9:30 a.m. or as soon thereafter as counsel may be heard, Defendants Transamerica Life Insurance Company, located at 1150 South Olive Street, Los Angeles, California 90015, Transamerica Investment Management, LLC, located at 11111 Santa Monica Boulevard, Los Angeles, California 90025, and Transamerica Asset Management, Inc., located at 570 Carillon Parkway, St. Petersburg, Florida 33716 (collectively, “Defendants”), by and through their undersigned counsel, will move before the Honorable Patty Shwartz, U.S.M.J., for entry of an order staying discovery in this matter until the Court decides Defendants’ pending motions to transfer venue and to dismiss for failure to state a claim. Defendants bring their motion to stay discovery on the following grounds:

1. Postponing discovery until Defendants’ motion to transfer venue and motions to dismiss have been decided is fair and efficient;

2. Staying discovery pending a decision on Defendants' motion to transfer venue promotes judicial economy;
3. Staying discovery pending a decision on Defendants' motions to dismiss is appropriate because Defendants have made a strong showing that Plaintiffs' claims are unmeritorious, Defendants would be unfairly prejudiced if they have to respond to overly burdensome discovery, and Plaintiffs are not unfairly prejudiced.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants will rely upon the Memorandum and supporting Declaration of Darcy Hatton submitted herewith. A proposed form of Order is also submitted. Defendants request oral argument of this motion.

Dated: May 16, 2011

s/ Thomas R. Curtin

Thomas R. Curtin

George C. Jones

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